



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JUL 26 2017

Mr. Michael L. House
Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

RE: Permit Termination Request at JF Queeny Facility, St. Louis, Missouri

Dear Mr. House:

The U.S. Environmental Protection Agency Region 7 is writing this letter in response to your letter (enclosed) dated October 18, 2016, requesting the termination of the RCRA Permit at the former John F. Queeny Facility in St. Louis, Missouri.

A summary of the recent ownership and enforcement history of the facility indicates that the ownership of the facility property was transferred from Solutia to SWH Investments and Environmental Operations, Inc. in 2008, and that the RCRA Permit has not been modified to transfer corrective action obligations from Solutia. Thus, corrective action obligations remain with Solutia under the Permit. In 2009, an Administrative Order on Consent was entered into between the EPA, SWH and EOI. Note MDNR is not a signatory to that AOC as you stated in your letter.

At this time, there are no causes specified in 40 CFR § 270.43 that warrant a termination of the Permit. Additionally, required financial assurance have yet to be fully funded for cleanup at this site. The EPA is in the process of selecting a site-wide remedy and will re-evaluate action on the Permit after a remedy is selected and a fully funded financial assurance mechanism is in place.

I can be reached at (913) 551-7755 if you have any questions concerning this matter.

RCRA 07/26/2017



568798

Sincerely,

Bruce A. Morrison
Project Manager
RCRA Corrective Action and Permits Section
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Chris Kump-Mitchel, MDNR
Rich Nussbaum, MDNR



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